

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

V.

**TIMOTHY LYNCH BARTON
CARNEGIE DEVELOPMENT, LLC
WALL007, LLC
WALL009, LLC
WALL010, LLC
WALL011, LLC
WALL012, LLC
WALL016, LLC
WALL017, LLC
WALL018, LLC
WALL019, LLC
HAOQIANG FU (a/k/a MICHAEL FU)
STEPHEN T. WALL**

Defendants,

DJD LAND PARTNERS, LLC
LDG001, LLC

Relief Defendants.

No. 3:22-CV-2118-X

Jury Trial Demanded

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

The undersigned counsel, under N.D. LOC. R. 83.12, move to withdraw as counsel for defendant Timothy Lynch Barton, and would show the Court as follows:

I.

The undersigned counsel wishes to withdraw for financial reasons. A substitution of counsel is unnecessary since other counsel for Barton have made appearances in this case. The undersigned counsel has played a limited role in the matter assisting lead counsel in the case.

Under these circumstances, the withdrawal should have no impact on this case. Based on the foregoing, the undersigned counsel respectfully requests that the Court order the undersigned counsel, Richard B. Roper, Javan Porter and Holland & Knight, LLP be withdrawn as counsel for defendant Timothy Lynch Barton.

Respectfully submitted:

/s/ Richard B. Roper

Richard B. Roper

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CERTIFICATE OF CONFERENCE

I have communicated with SEC counsel Keefe Bernstein, Receiver Counsel Charlene Koonce and codefendant counsel Mike Heiskell who indicated that, on behalf of their respective clients they do not oppose this instant motion.

/s/ Richard B. Roper

Richard B. Roper

CERTIFICATE OF SERVICE

On February 2, 2023, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served the all counsel of record electronically or by another manner authorized by rule.

/s/ Richard B. Roper

Richard B. Roper